

APPENDIX xx

**SEC Variation Testing Approach Document for the
Enduring Change of Supplier Arrangements**

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1 Definitions and Interpretations

1.1 In this SEC Variation Testing Approach Document for the Enduring Change of Supplier (ECoS) Arrangements (this “**ECOS SVTAD**”), except where the context otherwise requires, the expressions in the left-hand column within Table 1.1 shall have the meanings given to them in the right-hand column within Table 1.1. Where not defined in this ECoS SVTAD, words beginning with a capital letter used in this document are defined in Section A of the SEC.

1.2 Where there are conflicts between this ECoS SVTAD and the related ECoS Testing Approach Document, this ECoS SVTAD shall take precedence.

1.3 Where obligations are expressed in respect of DCC Service Providers in this ECoS SVTAD, these shall be construed as obligations on the DCC. Where text is included in this ECoS SVTAD which does not explicitly place obligations on a Party, the Panel, or Testing Participant, these shall be construed as obligations on the DCC.

Table 1.1 ECOS SVTAD Definitions

Term	Meaning
Centralised Registration Service (CRS) (aka Central Switching Service)	has the meaning given to this term in Part C of Condition 15 of the DCC Licence.
Completion Report	means a report that is produced setting out evidence demonstrating how the criteria for the completion of the testing has been met.
ECoS	the abbreviation for Enduring Change of Supplier.
ECoS Testing Approach Document	means the testing approach document produced pursuant to Clauses 3.2 – 3.5 of this document.
ECoS Mandated User Testing Document	means any document prepared pursuant to Clause 3 of this document that sets out the approach to mandatory User Testing.
ECoS Certificate	means an Organisation Certificate for which the ECoS Service Provider is the Subject.

ECoS Migration	means, in relation to a Device (or a number of Devices), the replacement of those Device Security Credentials held on or in relation to that Device (or those Devices) that have been populated with information from a TCoS Certificate with information from an ECoS Certificate and any supporting arrangements. The term “ECoS Migrated” shall be interpreted accordingly.
ECoS Service Provider	means the DCC Service Provider(s) that will support the operation of the CoS Party following the completion of the implementation of the Enduring Change of Supplier Arrangements.
Enduring Change of Supplier (ECoS) Variations	means the variations to the SEC that are planned as part of the introduction of the ECoS Arrangements, including, for the avoidance of doubt, those changes that will apply during the period of ECoS Migration. The variations shall, except to the extent agreed by the Secretary of State, additionally include those changes to the SEC that the Authority plans to make as part of the introduction of the Centralised Registration Service and which relate to the sending of Registration Data to the CoS Party.
Enduring Change of Supplier Arrangements (ECoS Arrangements)	has the meaning given to this term in Condition 13A of the DCC Licence.
Exit Criteria	means the criteria that must be met in order for testing (or a phase of testing) to complete.
Modified DCC Total System	means the DCC Total System as will be modified to enable the delivery of Services following the introduction of the ECoS Arrangements.
Subject	has the meaning given to that term in Appendix B of the SEC (Organisation Certificate Policy).
TAG	means the SEC Panel’s Testing Advisory Group.
TCoS	the abbreviation for transitional change of supplier.
TCoS Certificate	means an Organisation Certificate for which the TCoS Service Provider is the Subject.
TCoS Service Provider	means the DCC Service Provider that solely supported the operation of the CoS Party prior to the commencement of the implementation of the Enduring Change of Supplier Arrangements.

Testing Issue Thresholds	means the maximum number of extant Testing Issues that may be permitted at test completion.
User Testing	means testing by one or more Users of all or part of any changes to the Modified DCC Total System that occur as a result of the ECoS Arrangements

2 General

2.1 This document is the SEC Variation Testing Approach Document for the ECoS Variations.

2.2 Section X11.7 of the Code requires that the DCC and each person other than the DCC that participates in (or is required to participate in) testing under a SEC Variation Testing Approach Document shall comply with the SEC Variation Testing Approach Document.

2.3 Section X11.8 of the Code specifies that Section H14 of the Code (Testing Services) and Appendix J of the Code (Enduring Testing Approach Document) shall apply in respect of testing under a SEC Variation Testing Approach Document as if such testing was a Testing Service under Section H14.34 (Modification Implementation Testing); and each participant in such testing shall be deemed to be a Testing Participant for such purposes.

2.4 This ECoS SVTAD sets out:

- (a) the framework for the testing that is required to be undertaken for the introduction of the ECoS Variations;
- (b) the arrangements that apply to the development of the ECoS Testing Approach Document; and
- (c) the rules to apply to the development of any ECoS Mandated User Testing Document.

2.5 This ECoS SVTAD shall be modified by the DCC in accordance with any direction to do so made by the Secretary of State. The DCC shall consult with Parties concerning any proposed modification to those documents in accordance with any direction to do so made by the Secretary of State.

2.6 The ECoS Testing Approach Document shall be modified by the DCC in accordance with any direction to do so made by the Secretary of State. Any such modifications shall be submitted by the DCC to the TAG for agreement in accordance with the provisions of Clause 3.3, and the provisions of Clause 3.4 shall apply (again) to the revised version of the document.

2.7 This ECoS SVTAD may be modified by the DCC following consultation with Parties and other relevant persons, the TAG, the Authority, and the Secretary of State, provided that:

(a) prior to making any such modification, the DCC must present to the Secretary of State a summary of the consultation responses received and an explanation of how the DCC has taken them into account; and

(b) may not be modified to the extent that the Secretary of State directs otherwise.

2.8 The ECoS SVTAD may be modified by DCC without consultation where the modification is of a minor typographical nature, or where the modification does not have any material effect on the rights or obligations of SEC Parties or any other person who is entitled to undertake testing in accordance with this document.

3 ECoS Testing Approach Documents

3.1 Testing undertaken pursuant to this ECoS SVTAD shall be performed by the DCC and any other Party that participates in it in accordance with Good Industry Practice.

3.2 The DCC shall prepare a draft ECoS Testing Approach Document, which may include the approach to testing where it is required for the changes that comprise part of the ECoS Variations including:

(a) the proposed amendments to this Code that are the subject of the testing, an explanation of the associated changes to the Modified DCC Total System, and the testing objective;

(b) the testing environments to be used;

(c) the requirements (if any) for device testing;

- (d) the requirements (if any) for security testing;
- (e) the requirements (if any) for system capacity testing;
- (f) the testing that shall be undertaken, both in terms of the scope of testing and the extent of testing (including negative tests) and the approach to regression testing;
- (g) the requirements for ECoS Migration testing;
- (h) the applicable Testing Issue Thresholds and the process for excluding Testing Issues;
- (i) the exit criteria for testing to complete successfully;
- (j) any perceived risks associated with the approach to testing and the proposed mitigations;
- (k) the approach to providing for assurance of the testing undertaken; and
- (l) matters to be included in the ECoS SEC Release Testing Completion Report (to be prepared pursuant to Clause 4.1).

3.3 The DCC shall submit the draft ECoS Testing Approach Document to the TAG for review (and such submission by the DCC and review by the TAG may take place prior to this Clause 3.3 coming into effect); and:

- (a) where the TAG and the DCC can reach an agreement, the relevant draft ECoS Testing Approach Document shall be updated by the DCC as necessary and deemed to be final; or
- (b) where the TAG and the DCC cannot reach an agreement on the approach to testing for the ECoS Variations, the matters of disagreement shall be referred by the DCC to the Secretary of State for determination. The Secretary of State's decision on such matters shall be final and binding for the purposes of this Code and the relevant draft ECoS Testing Approach Document shall be updated by the DCC as necessary and deemed to be final.

3.4 The DCC shall comply with the ECoS Testing Approach Document and shall take all reasonable steps to complete the tests set out in the ECoS Testing Approach

Document in accordance with the milestone plan published by the DCC for the ECoS Variations.

3.5 Revisions to the ECoS Testing Approach Document finalised pursuant to Clause 3.2 may, from time to time, be submitted by the DCC to the TAG for agreement in accordance with the provisions of Clause 3.3, and the provisions of Clause 3.4 shall apply (again) to the revised version of the document.

3.6 The ECoS Testing Approach Document shall set out the Devices to be used for testing. Where there is a disagreement between DCC and the TAG on Devices to be used for testing in respect of the ECoS changes, it shall be referred to the Secretary of State for determination whose decision shall be final and binding.

3.7 Where the DCC considers that User Testing is required prior to implementation of the ECoS Variations it shall set out its proposals for User Testing in a draft ECoS Mandated User Testing Document, including those Users that should be required to participate in the testing and the User Role in which they are required to participate; the approach to testing; the arrangements for test completion; the process for resolving testing disputes; and notification of test completion. In developing the ECoS Mandated User Testing Document, the DCC shall consult with the TAG, Parties, and other relevant stakeholders prior to the submission of the document to the Secretary of State.

3.8 Following consultation under Clause 3.7, the DCC shall submit the draft ECoS Mandated User Testing Document to the Secretary of State, indicating:

- (a) why the DCC considers the draft to be fit for purpose;
- (b) copies of the consultation responses received; and
- (c) any areas of disagreement that arose during the consultation process and that have not been resolved.

3.9 The DCC shall comply with any direction given by the Secretary of State to re-consider, re-consult, and/or re-submit the draft document.

3.10 Should an ECoS Mandated User Testing Document be approved by the Secretary of State, the DCC and each Party other than the DCC that participates in (or

is required to participate in) testing, as set out in such approved document, shall comply with that ECoS Mandated User Testing Document.

3.11 Each Supplier Party shall, where and to the extent reasonably requested by the DCC, provide information to the DCC relating to whether it intends to carry out testing of its User Systems in order to verify that it will be able to successfully submit “CoS Update Security Credentials” Service Requests under the ECoS Arrangements and have them successfully processed, and if so:

- (a) when it proposes to carry out those tests;
- (b) detail about the specific tests that it proposes to conduct, and
- (c) following completion of the tests, whether or not the tests that it carried out demonstrated that the User could submit “CoS Update Security Credentials” Service Requests under the ECoS Arrangements and have them successfully executed.

4 Test Completion

4.1 Completion of the testing for the ECoS Variations set out in the ECoS Testing Approach Document shall only complete when the Panel determines that the Exit Criteria set out in that document for that testing have been met. When the DCC considers that such completion ought to occur, the DCC shall prepare a Completion Report (which may comprise part of an ECoS SEC Release Completion Report) as provided for in the ECoS Testing Approach Document. The DCC shall:

- (a) notify the Secretary of State, the Authority, the Panel, TAG and the Parties that the DCC considers that testing has been completed;
- (b) provide the Authority, the Panel, TAG and the Secretary of State with copies of the Completion Report (or where one exists, the ECoS SEC Release Completion Report), and a list of the sections of such report that the DCC considers should be redacted prior to publication; and
- (c) review the supporting documentation and evidence with regards to the relevant Exit Criteria with the TAG.

4.2 The Panel shall confirm the completion of testing for the ECoS changes set out in the ECoS Testing Approach Document or shall highlight where it believes the Exit Criteria have not been met.

4.3 Where the Panel confirms the completion of testing for the ECoS changes (subject to the Panel and the DCC reaching an agreement regarding resolution of any issues raised by the Panel) the Completion Report (or where one exists, the ECoS SEC Release Completion Report) shall be updated by the DCC as necessary and deemed to be final.

4.4 Where the Panel declines to confirm the completion of testing for the ECoS changes, the DCC shall update the Completion Report (or where one exists, the ECoS SEC Release Completion Report) to reflect resolution of any issues where the DCC and the Panel reached an agreement, and the DCC shall then either:

- (a) refer the matters where the Panel and the DCC disagree with respect to the ECoS changes to the Secretary of State for determination; or
- (b) continue with testing (and Clause 4.1 onwards shall apply again).

4.5 Where a referral has been made by the DCC pursuant to Clause 4.4, the determination of the Secretary of State shall be final and binding for the purposes of this Code as follows:

- (a) where the Secretary of State agrees that testing for the ECoS changes is complete, the relevant Completion Report (or where one exists, the ECoS SEC Release Completion Report) shall be updated by the DCC as necessary and the contents relating to the ECoS changes shall be deemed to be final; or
- (b) where the Secretary of State disagrees that testing for the ECoS changes is complete, the DCC shall continue with testing (and Clause 4.1 onwards shall apply again).

4.6 The DCC shall publish the final Completion Report (or where one exists, the ECoS SEC Release Completion Report), which shall be anonymised and redacted where directed by the Panel, on the DCC Website. The DCC shall notify the Panel, the Secretary of State, the Authority, and the SEC Parties of the publication of the report.